

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

JAMES CONROY,	)	CASE NO. 4:15-cv-01456
	)	
Plaintiff,	)	JUDGE BENITA Y. PEARSON
	)	
vs.	)	
	)	
CORRECTIONS CORPORATION OF AMERICA, et al.,	)	<b><u>DEFENDANTS' CORRECTIONS</u></b>
	)	<b><u>CORPORATION OF AMERICA'S</u></b>
	)	<b><u>AND MIKE PUGH'S MOTION TO</u></b>
	)	<b><u>AMEND BY INTERLINEATION</u></b>
Defendants.	)	<b><u>THEIR ANSWER TO PLAINTIFF'S</u></b>
	)	<b><u>COMPLAINT</u></b>

Now come Defendants Corrections Corporation of America and Mike Pugh (collectively "Defendants"), by and through counsel, and hereby move this Honorable Court to permit them to amend by interlineation their Answer to Plaintiff's Complaint. For cause, Defendants assert that there was an error at Paragraph 146 of their answer. As such, Defendants request they be permitted to amend by interlineation their answer to Paragraph 146 of Plaintiff's Complaint as follows:

146. Defendants deny the statements and allegations contained in Paragraph 146 of Plaintiff's Complaint.

This amendment was discussed at the Case Management Conference on September 23, 2015. Plaintiff had no objection to the amendment.

Wherefore, Defendants respectfully request that their Answer to Plaintiff's Complaint be amended by interlineation at Paragraph 146 as a denial of the allegations in Paragraph 146 of Plaintiff's Complaint. Each and every other admission, denial, averment and affirmative defense contained in Defendants' Answer shall remain as stated in the Answer filed on August 11, 2015 (Doc #7).

Respectfully submitted,

/s/ Steven J. Forbes

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### **CERTIFICATE OF SERVICE**

This document has been filed electronically with the Court this 23rd day of September, 2015. Notice of this filing will be sent to all counsel through the Court's electronic filing system. Parties can access this document through the Court's system.

/s/ Steven J. Forbes

Counsel for Defendants

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